

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARQUITTA NICHOLSON,

Plaintiff.

v.

WIDER GROUP, INC

Defendant.

Case No. 1:23-cv- 04537

Hon. LaShonda A. Hunt

**PLAINTIFF'S MOTION FOR DEFAULT  
JUDGMENT AGAINST WIDER GROUP, INC.**

**NOW COMES** Marquitta Nicholson (“Plaintiff”), by and through her attorneys, Sulaiman Law Group, Ltd. (“Sulaiman”) and pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, requesting that this Honorable Court enter a Default Judgment against Wider Group, Inc., (“Defendant”) and in support thereof, stating as follows:

1. On July 13, 2023, Plaintiff filed her Complaint for Relief pursuant to discrimination on the basis of Plaintiff’s sex, and Defendant’s retaliation against Plaintiff for engaging in protected activity under Title VII. [Dkt. 1].

2. On August 2, 2023, process server Joseph Galason served Illiana Garcia, of the Defendant, with a copy of the Complaint and Summons.

3. On August 23, 2023, Defendant’s time to answer or otherwise plead elapsed.

4. On August 23, 2023, after Defendant failed to answer or otherwise plead, Plaintiff filed a Motion for Entry of Default. Attached to the Motion for Entry of Default was an affidavit signed by the undersigned counsel, attesting that service had properly been effectuated and Defendant was not in member of a protected category. A copy of Plaintiff’s Motion for Entry of Default was mailed to Defendant.

5. On September 9, 2023, this Honorable Court granted an Entry of Default against Defendant.

6. Having gained an Entry of Default against the Defendant, Plaintiff now moves this Honorable Court to enter a Default Judgment against the Defendant and in favor of Plaintiff.

7. Defendant is aware of the instant proceedings and has willfully chosen not to formally enter the case despite proper service and additional notice from the undersigned.

8. Based on Defendant's conduct, Plaintiff believes this Honorable Court should not hesitate to impose liability against the Defendant to the fullest extent of the law. As Plaintiff's Complaint states, Defendant subjected Plaintiff to different terms and conditions of employment than others not within her protected class because of her sex. She was also egregiously sexually harassed/ Plaintiff was retaliated against and her employment was terminated for reporting this sexual harassment and discrimination. Specifically, Defendant reduced Plaintiff's hours and ultimately terminated her employment.

9. Defendant has clearly demonstrated a lack of respect for the legal process. They have had clear notice of this lawsuit through its representatives authorized to accept service as well as the Certificates of Services that were mailed to them after Entry of Default was entered against them. Rather than participate in the legal process, Defendant has willfully chosen not to participate and as such has waived its right to be given any benefit by this Court.

10. Plaintiff requests this Honorable Court enter Default Judgment in favor of Plaintiff and against Defendant in the amount of \$83,723.32 (*See Exhibit A, Affidavit of Alexander Taylor, Esq.*).

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court enter judgment in her favor as follows:

- a. Entering a Default Judgment against Defendant and in favor of Plaintiff;

- b. Awarding Plaintiff actual damages of \$40,672.86 against Defendant and in favor of Plaintiff;
- c. Awarding Plaintiff emotional damages of \$40,000.00 against Defendant and in favor of Plaintiff;
- d. Awarding Plaintiff \$4,746.67 in costs and reasonable attorney fees pursuant against Defendant and in favor of Plaintiff;
- e. Allowing judgment interest to be added; and
- f. Awarding any other relief as this Honorable Court deems just and appropriate.

Dated: November 6 2023

Respectfully submitted,

/s/ Alexander Taylor

Alexander Taylor, Esq.  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiff, certifies that on this 6<sup>th</sup> day of November, 2023, he caused a copy of the foregoing PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST MCCOY SERVICES, INC, to be served by U.S. Priority mail, postage prepaid, on:

WIDER GROUP, INC.  
c/o Illiana Garcia  
16618 State St.,  
South Holland, IL 60473  
*Defendant*

/s/ Alexander Taylor

Alexander Taylor, Esq.